

# Exhibit 2

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

AMANDA DECKER,

Plaintiff,

v.

RECEIVABLES PERFORMANCE  
MANAGEMENT, LLC.

Defendant.

Case No: 17-cv-04152

Honorable Judge Manish S. Shah

**DECLARATION OF MARWAN R. DAHER**

I, Marwan R. Daher, declare that I am an attorney at the law firm Sulaiman Law Group, Ltd., counsel for Amanda Decker (“Plaintiff”) in this case. I am familiar with the facts set forth in this declaration.

1. I am over the age of 21, under no legal disability, and I have personal knowledge of the facts set forth in this Declaration. If called as a witness I could and would testify to the following:
2. I am one of the attorneys for the Plaintiff in this case.
3. I have been admitted to the practice of law since 2017.
4. I am a member of good standing of the following Courts:
  - The United States District Court for the Northern and Southern Districts of Illinois
  - The United States District Court for the Northern and Southern Districts of Indiana
  - The United States District Court for the Eastern and Western Districts of Wisconsin
  - The United States District Court for the Eastern, Northern, Western, and Southern Districts of Texas
  - The United States District Court for the Northern District of Ohio
  - The United States District Court of Colorado

- State Courts of Illinois

5. I have substantial experience in representing consumers in claims brought pursuant to the Fair Debt Collection Practices Act (“FDCPA”), Fair Credit Reporting Act (“FCRA”), Telephone Consumer Protection Act (“TCPA”), and the Illinois Consumer Fraud and Deceptive Business Practices Act (“ICFA”).
6. I have represented over 450 consumers in cases filed in Illinois and other jurisdictions.
7. The rate that I billed per hour in this case is \$275.00, which is justified by my experience, the nature and complexity of the cases I handle, and the relative risk involved in consumer cases.
8. The hourly rate of \$275.00 that I billed in this case is consistent with that charged by attorneys practicing consumer law, as reported in the United States Consumer Law Attorney Fee Survey Report 2015-2016, ps. 27-29, 223-224, said Report being available online at <https://www.nclc.org/images/pdf/litigation/tools/atty-fee-survey-2015-2016.pdf>.
9. Courts using the US Consumer Law Attorney Fee Survey Report when deciding fee disputes in Consumer Law cases include the following: Decker v. Transworld Systems, Inc., 2009 WL 2916819 (N.D. Ill. 2009) (finding results in the United States Consumer Law Attorney Fee Survey Report to be supported by the Laffey Matrix); Vahidy v. Transworld Systems, Inc., 2009 WL 2916825 (N.D. Ill. 2009) (finding results in the 2007 United States Consumer Law Attorney Fee Survey Report to be supported by the Laffey Matrix).
10. My hourly rate is further supported by the fact that I have prevailed in obtaining settlement or judgment on behalf of my clients in over 92% of the cases that I have filed.
11. The amount of hours I expended in this case is 24.8 hours, and I billed at the rate of \$275.00, from the inception of the case to the present day.

12. The lodestar fee amount for the work I rendered is \$6,820.00 (24.8 x \$275.00).
13. I completely performed the services reflected above. The services performed were both reasonable and necessary to effectively represent my client.
14. I am seeking attorney's fees in the amount of \$6,820.00. *See* attached Exhibit 2-A.
15. I have been annually recognized by Thomson Reuters as an Illinois Super Lawyer Rising Star from 2017 through the present.
16. I am familiar with the hourly rates of attorneys in this District that perform consumer work.
17. I have reviewed the time sheets for Mohammed Badwan and find the hours he expended in this case to be reasonable and necessary.
18. Mohammed Badwan's hourly rate of \$425.00 is reasonable and consistent with his experience and skill level.
19. These requested attorney's fees were reasonable and the work expended was necessary to protect Ms. Decker's interests.

Pursuant to 28 U.S.C. § 1746(2), I, Marwan R. Daher, hereby declare under penalty of perjury that the foregoing is true and correct.

Dated: November 5, 2019

Respectfully Submitted,

/s/ Marwan R. Daher

# Exhibit 2-A

Bill Date	Dur/Qty	Bill Code	Description	Staff	Client	Hourly Rate	Total
5/20/2017	0.8	CONTINGENCY	Phone call with client	MRD	Amanda Decker	\$275.00	\$220.00
5/24/2017	0.4	CONTINGENCY	Phone call with client	MRD	Amanda Decker	\$275.00	\$110.00
5/24/2017	3.4	CONTINGENCY	Prepare Complaint	MRD	Amanda Decker	\$275.00	\$935.00
6/30/2017	0.1	CONTINGENCY	Email exchange with Sean Flynn re Stipulation to Extend Time	MRD	Amanda Decker	\$275.00	\$27.50
6/30/2017	0.1	CONTINGENCY	Review Defendant's Motion for Extension of Time	MRD	Amanda Decker	\$275.00	\$27.50
7/1/2017	0.8	CONTINGENCY	Review Defendant's Answer to Complaint	MRD	Amanda Decker	\$275.00	\$220.00
8/1/2017	0.1	CONTINGENCY	Email exchange with Sean Flynn re Joint Status Report	MRD	Amanda Decker	\$275.00	\$27.50
8/1/2017	0.3	CONTINGENCY	Review Joint Status Report	MRD	Amanda Decker	\$275.00	\$82.50
8/3/2017	0.4	CONTINGENCY	Prepare for Initial Status Hearing	MRD	Amanda Decker	\$275.00	\$110.00
8/4/2017	2	CONTINGENCY	Appear for Initial Status Hearing	MRD	Amanda Decker	\$275.00	\$550.00
8/7/2017	2.8	CONTINGENCY	Prepare Discovery Requests to Defendant	MRD	Amanda Decker	\$275.00	\$770.00
8/9/2017	0.1	CONTINGENCY	Email to Sean Flynn with Subpoena to LiveVox	MRD	Amanda Decker	\$275.00	\$27.50
8/15/2017	0.1	CONTINGENCY	Email exchange with Sean Flynn re available dates	MRD	Amanda Decker	\$275.00	\$27.50
8/15/2017	0.1	CONTINGENCY	Email exchange with Sean Flynn re facts of case	MRD	Amanda Decker	\$275.00	\$27.50
8/15/2017	0.1	CONTINGENCY	Email exchange with Sean Flynn re facts of case	MRD	Amanda Decker	\$275.00	\$27.50
8/30/2017	0.1	CONTINGENCY	Review email response from LiveVox counsel re document production	MRD	Amanda Decker	\$275.00	\$27.50
9/5/2017	0.1	CONTINGENCY	Reviewed email from Sean Flynn re discovery requests and notice of deposition	MRD	Amanda Decker	\$275.00	\$27.50
9/19/2017	0.1	CONTINGENCY	Email to Sean Flynn with Plaintiff's demand	MRD	Amanda Decker	\$275.00	\$27.50
9/19/2017	0.1	CONTINGENCY	Email exchange with Sean Flynn re amending of the complaint	MRD	Amanda Decker	\$275.00	\$27.50
9/19/2017	0.1	CONTINGENCY	Email to Sean Flynn re settlement demand	MRD	Amanda Decker	\$275.00	\$27.50
9/19/2017	0.1	CONTINGENCY	Email exchange with Sean Flynn re Notice of Deposition objections	MRD	Amanda Decker	\$275.00	\$27.50
9/20/2017	0.1	CONTINGENCY	Reviewed email from Sean Flynn re discovery responses	MRD	Amanda Decker	\$275.00	\$27.50
9/20/2017	0.1	CONTINGENCY	Email exchange with Sean Flynn re amending of the complaint	MRD	Amanda Decker	\$275.00	\$27.50
9/21/2017	1	CONTINGENCY	Rule 37 Meet and Confer re Deposition Topics	MOB	Amanda Decker	\$425.00	\$425.00
9/21/2017	0.1	CONTINGENCY	Email exchange with Sean Flynn re document production	MRD	Amanda Decker	\$275.00	\$27.50
9/23/2017	0.1	CONTINGENCY	Email exchange with Sean Flynn re proposed protective order	MRD	Amanda Decker	\$275.00	\$27.50
9/25/2017	0.1	CONTINGENCY	Email exchange with Sean Flynn re verification of discovery responses	MRD	Amanda Decker	\$275.00	\$27.50
10/2/2017	0.1	CONTINGENCY	Email exchange with Sean Flynn re extension of time for discovery	MRD	Amanda Decker	\$275.00	\$27.50
10/12/2017	0.1	CONTINGENCY	Review Plaintiff's Verizon Call Records	MRD	Amanda Decker	\$275.00	\$27.50
10/13/2017	0.1	CONTINGENCY	Email exchange with Sean Flynn re initial response to settlement demand	MRD	Amanda Decker	\$275.00	\$27.50
10/16/2017	5.8	CONTINGENCY	Prepare Plaintiff's responses to Defendant's discovery requests; confer with client re: same	MRD	Amanda Decker	\$275.00	\$1,595.00
10/20/2017	2	CONTINGENCY	Appear for Status Hearing	NCV	Amanda Decker	NC	NC
10/20/2017	0.1	CONTINGENCY	Email to Sean Flynn re settlement demand	MRD	Amanda Decker	\$275.00	\$27.50
10/20/2017	0.1	CONTINGENCY	Email exchange with Sean Flynn re 10/20/17 status conference	MRD	Amanda Decker	\$275.00	\$27.50
10/23/2017	0.1	CONTINGENCY	Email exchange with Sean Flynn re demand and document production	MRD	Amanda Decker	\$275.00	\$27.50
11/3/2017	0.1	CONTINGENCY	Email to Sean Flynn re settlement demand	MRD	Amanda Decker	\$275.00	\$27.50
11/14/2017	0.1	CONTINGENCY	Email to Sean Flynn re 30b6 witness availability	MRD	Amanda Decker	\$275.00	\$27.50
11/28/2017	0.1	CONTINGENCY	Email to Sean Flynn re LiveVox Subpoena	MRD	Amanda Decker	\$275.00	\$27.50
12/1/2017	0.1	CONTINGENCY	Email exchange with Leslie Handy re Initial Disclosures	MRD	Amanda Decker	\$275.00	\$27.50
12/8/2017	0.1	CONTINGENCY	Email to Sean Flynn re possible dates for deposition	MRD	Amanda Decker	\$275.00	\$27.50
12/14/2017	0.1	CONTINGENCY	Email exchange with Sean Flynn re objections to notice of deposition	MRD	Amanda Decker	\$275.00	\$27.50
12/18/2017	0.1	CONTINGENCY	Email exchange with Sean Flynn re Plaintiff's Deposition	MRD	Amanda Decker	\$275.00	\$27.50
12/19/2017	0.4	CONTINGENCY	Review proposed protective order	MRD	Amanda Decker	\$275.00	\$110.00
12/19/2017	0.1	CONTINGENCY	Reviewed email from Sean Flynn re discovery	MRD	Amanda Decker	\$275.00	\$27.50
12/19/2017	0.1	CONTINGENCY	Email to Sean Flynn re protective order	MRD	Amanda Decker	\$275.00	\$27.50
12/21/2017	0.5	CONTINGENCY	Phone Call with Nate Read re LiveVox subpoena response and availability for deposition	MOB	Amanda Decker	\$425.00	\$212.50
12/26/2017	0.1	CONTINGENCY	Email exchange with Sean Flynn re Deposition of Plaintiff	MRD	Amanda Decker	\$275.00	\$27.50
1/3/2018	0.1	CONTINGENCY	Email exchange with LiveVox counsel re deposition availability	MOB	Amanda Decker	\$425.00	\$42.50
1/4/2018	0.1	CONTINGENCY	Email to Sean Flynn re possible telephonic deposition of Plaintiff	MRD	Amanda Decker	\$275.00	\$27.50
1/5/2018	0.1	CONTINGENCY	Email exchange with Sean Flynn re depositions dates	MRD	Amanda Decker	\$275.00	\$27.50
1/5/2018	0.1	CONTINGENCY	Email exchange with Sean Flynn re Defendant's deposition	MRD	Amanda Decker	\$275.00	\$27.50
1/8/2018	0.1	CONTINGENCY	Email exchange with Sean Flynn re objections to notice of deposition	MRD	Amanda Decker	\$275.00	\$27.50
1/9/2018	2	CONTINGENCY	Review Defendant's Discovery Responses and Send email to OC re meet and confer	MOB	Amanda Decker	\$425.00	\$850.00
1/10/2018	0.6	CONTINGENCY	Prepare for Status Hearing; Motion for Protective Order; Motion to Extend Discovery Deadline	MOB	Amanda Decker	\$425.00	\$255.00
1/10/2018	0.1	CONTINGENCY	Email to Sean Flynn re document production and court reporter for deposition	MRD	Amanda Decker	\$275.00	\$27.50

1/11/2018	0.2	CONTINGENCY	Email to Sean Flynn re merits of case	MOB	Amanda Decker	\$425.00	\$85.00
1/11/2018	0.2	CONTINGENCY	Email to Sean Flynn re RPM deposition and meet and confer availability	MOB	Amanda Decker	\$425.00	\$85.00
1/11/2018	2.3	CONTINGENCY	Appear for Status Hearing; Motion to Extend Discovery; Motion for Protective Order	MOB	Amanda Decker	\$425.00	\$977.50
1/11/2018	0.1	CONTINGENCY	Email exchange with Sean Flynn re Deposition of Plaintiff	MRD	Amanda Decker	\$275.00	\$27.50
1/23/2018	0.1	CONTINGENCY	Email exchange with Sean Flynn re Defendant's deposition	MRD	Amanda Decker	\$275.00	\$27.50
1/25/2018	0.1	CONTINGENCY	Email exchange with Sean Flynn re Plaintiff's Deposition	MOB	Amanda Decker	\$425.00	\$42.50
1/25/2018	0.1	CONTINGENCY	Email to Sean Flynn re Plaintiff's Deposition	MRD	Amanda Decker	\$275.00	\$27.50
1/29/2018	0.1	CONTINGENCY	Email exchange with Sean Flynn re available dates for corporate deposition and experts	MRD	Amanda Decker	\$275.00	\$27.50
2/2/2018	0.6	CONTINGENCY	Prepare Contested Status Report on Expert Discovery and Dispositive Motions	MOB	Amanda Decker	\$425.00	\$255.00
2/2/2018	0.3	CONTINGENCY	Meet and Confer with Sean Flynn re Expert Discovery and Dispositive Motions	MOB	Amanda Decker	\$425.00	\$127.50
2/5/2018	0.1	CONTINGENCY	Email to Sean Flynn with Seconded Amended Notice of Deposition	MRD	Amanda Decker	\$275.00	\$27.50
2/6/2018	3	CONTINGENCY	Appear for Plaintiff's Deposition	MRD	Amanda Decker	\$275.00	\$825.00
2/6/2018	1.5	CONTINGENCY	Review LiveVox Production and Prepare Email to its Counsel re Deposition Alternatives	MOB	Amanda Decker	\$425.00	\$637.50
2/6/2018	0.1	CONTINGENCY	Email exchange with Sean Flynn re Deposition of RPM	MOB	Amanda Decker	\$425.00	\$42.50
2/8/2018	0.3	CONTINGENCY	Phone call with Nate Read re LiveVox deposition	MOB	Amanda Decker	\$425.00	\$127.50
2/8/2018	0.2	CONTINGENCY	Review email response from LiveVox counsel re declaration needed to avoid deposition	MOB	Amanda Decker	\$425.00	\$85.00
2/9/2018	0.1	CONTINGENCY	Email exchange with Sean Flynn re objections to notice of deposition	MRD	Amanda Decker	\$275.00	\$27.50
2/13/2018	6.9	CONTINGENCY	Prepare for RPM Deposition	MOB	Amanda Decker	\$425.00	\$2,932.50
2/14/2018	2.1	CONTINGENCY	Prepare for RPM Deposition	MOB	Amanda Decker	\$425.00	\$892.50
2/14/2018	2.8	CONTINGENCY	Appear for RPM Deposition	MOB	Amanda Decker	\$425.00	\$1,190.00
2/14/2018	0.1	CONTINGENCY	Email exchange with Nathaniel P.T. Read re depositions	MRD	Amanda Decker	\$275.00	\$27.50
2/15/2018	3	CONTINGENCY	Prepare Motion to Extend Discovery and Compel	MOB	Amanda Decker	\$425.00	\$1,275.00
2/15/2018	0.2	CONTINGENCY	Email to Daniel Mckenna re LiveVox Dep in O'Connor	MOB	Amanda Decker	\$425.00	\$85.00
2/16/2018	5.8	CONTINGENCY	Prepare Motion to Compel and Extend Discovery	MOB	Amanda Decker	\$425.00	\$2,465.00
2/20/2018	0.2	CONTINGENCY	Email to Sean Flynn re rescheduling 2.22.18 hearing per defense counsel	MOB	Amanda Decker	\$425.00	\$85.00
3/6/2018	0.4	CONTINGENCY	Review and analyze Defendant's response to Motion to Compel	MOB	Amanda Decker	\$425.00	\$170.00
3/12/2018	0.2	CONTINGENCY	Review court's Order on Motion to Compel	MOB	Amanda Decker	\$425.00	\$85.00
3/14/2018	0.2	CONTINGENCY	Review Court's 3.10.18 Order and prepare email to Sean Flynn re available dates	MOB	Amanda Decker	\$425.00	\$85.00
3/15/2018	0.3	CONTINGENCY	Phone call with Sean Flynn re RPM Deposition and Potential Settlement	MOB	Amanda Decker	\$425.00	\$127.50
3/22/2018	0.3	CONTINGENCY	Email exchange with LiveVox counsel re declaration	MOB	Amanda Decker	\$425.00	\$127.50
3/28/2018	0.5	CONTINGENCY	Phone call with Randall Snyder	MOB	Amanda Decker	\$425.00	\$212.50
3/28/2018	0.3	CONTINGENCY	Email exchange with Randall Snyder re expert report due 4.16.18	MOB	Amanda Decker	\$425.00	\$127.50
4/3/2018	2	CONTINGENCY	Prepare Motion to Compel and Email to Sean Flynn	MOB	Amanda Decker	\$425.00	\$850.00
4/4/2018	0.2	CONTINGENCY	Email to Sean Flynn re expert discovery deadlines and RPM availability for deposition	MOB	Amanda Decker	\$425.00	\$85.00
4/6/2018	0.2	CONTINGENCY	Reviewed email from Sean Flynn re expert discovery deadlines and RPM's continued deposition	MOB	Amanda Decker	\$425.00	\$85.00
4/9/2018	1.4	CONTINGENCY	Prepare Motion to Vacate Expert Discovery Deadlines and Circulate to Defense Counsel	MOB	Amanda Decker	\$425.00	\$595.00
4/9/2018	0.1	CONTINGENCY	Email to Sean Flynn re document production	MRD	Amanda Decker	\$275.00	\$27.50
4/10/2018	0.4	CONTINGENCY	Revise Unopposed Motion to Vacate Discovery Deadlines after Confering with Sean Flynn	MOB	Amanda Decker	\$425.00	\$170.00
5/2/2018	1.8	CONTINGENCY	Review and analyze Defendant's Motion for Summary Judgment	MOB	Amanda Decker	\$425.00	\$765.00
5/9/2018	1.4	CONTINGENCY	Prepare for Status Hearing and Review Defendant's MSJ	MOB	Amanda Decker	\$425.00	\$595.00
5/24/2018	4.6	CONTINGENCY	Prepare for RPM Continued Deposition	MOB	Amanda Decker	\$425.00	\$1,955.00
5/25/2018	5.1	CONTINGENCY	Appear and Take RPM's Deposition	MOB	Amanda Decker	\$425.00	\$2,167.50
7/11/2018	6.4	CONTINGENCY	Prepare Response to Defendant's Statement of Material Facts	MOB	Amanda Decker	\$425.00	\$2,720.00
7/12/2018	7.3	CONTINGENCY	Prepare Response to Statement of Material Facts	MOB	Amanda Decker	\$425.00	\$3,102.50
7/13/2018	8.1	CONTINGENCY	Prepare Response to Motion for Summary Judgment	MOB	Amanda Decker	\$425.00	\$3,442.50
7/16/2018	7.8	CONTINGENCY	Prepare Response to Motion for Summary Judgment	MOB	Amanda Decker	\$425.00	\$3,315.00
7/30/2018	0.7	CONTINGENCY	Review and analyze Defendant's Reply in Support of Motion for Summary Judgment	MOB	Amanda Decker	\$425.00	\$297.50
3/25/2019	0.3	CONTINGENCY	Phone call with defense counsel re trial date and interest in settlement	MOB	Amanda Decker	\$425.00	\$127.50
3/26/2019	2	CONTINGENCY	Appear for Status Hearing	MOB	Amanda Decker	\$425.00	\$850.00
4/3/2019	1	CONTINGENCY	Prepare settlement demand to defendant	MOB	Amanda Decker	\$425.00	\$425.00
4/3/2019	0.4	CONTINGENCY	Phone call with client re settlement	MOB	Amanda Decker	\$425.00	\$170.00
4/3/2019	0.1	CONTINGENCY	Email exchange with Sean Flynn re Plaintiff's Demand	MOB	Amanda Decker	\$425.00	\$42.50
5/14/2019	2	CONTINGENCY	Appear for Status Hearing	MOB	Amanda Decker	\$425.00	\$850.00
6/14/2019	1.6	CONTINGENCY	Prepared Timesheet and Submit to Sean Flynn (settlement efforts)	MOB	Amanda Decker	\$425.00	\$680.00
7/12/2019	0.5	CONTINGENCY	Phone call with Sean Flynn re: validity of the acceptance of the offer of judgment	MOB	Amanda Decker	\$425.00	\$212.50

7/12/2019	0.3	CONTINGENCY	Prepare email to Sean Flynn re: validity of the acceptance of the offer of judgment	MOB	Amanda Decker	\$425.00	\$127.50
7/12/2019	1.3	CONTINGENCY	Case law research on offers of judgment and proper acceptance	MOB	Amanda Decker	\$425.00	\$552.50
7/16/2019	0.9	CONTINGENCY	Prepare Notice of Acceptance and Related Document for Filing	MOB	Amanda Decker	\$425.00	\$382.50
7/16/2019	3.3	CONTINGENCY	Prepare Motion for Entry of Judgment (after defendant challenged the validity of the acceptance of judgment)	MOB	Amanda Decker	\$425.00	\$1,402.50
7/23/2019	0.4	CONTINGENCY	Review Defendant's proposed judgment order	MOB	Amanda Decker	\$425.00	\$170.00
7/23/2019	0.6	CONTINGENCY	Prepare Plaintiff's proposed judgment order (Plaintiff's version)	MOB	Amanda Decker	\$425.00	\$255.00
7/23/2019	0.1	CONTINGENCY	Email to Sean Flynn re: proposed judgment order	MOB	Amanda Decker	\$425.00	\$42.50
8/2/2019	0.1	CONTINGENCY	Email to Sean Flynn re: meet and confer pertaining to Local Rule 54.3 (fee petitions)	MOB	Amanda Decker	\$425.00	\$42.50
8/6/2018	0.5	CONTINGENCY	Conference call with Sean Flynn re: deadlines prescribed by Local Rule 54.3	MOB	Amanda Decker	\$425.00	\$212.50
8/7/2019	0.3	CONTINGENCY	Email exchange with Sean Flynn re: agreed deadlines pertaining to Local Rule 54.3	MOB	Amanda Decker	\$425.00	\$127.50
8/12/2019	1.8	CONTINGENCY	Prepare time records submission pursuant to Local Rule 54.3	MOB	Amanda Decker	\$425.00	\$765.00
8/15/2019	0.3	CONTINGENCY	Cursory review of Defendant's billing records	MOB	Amanda Decker	\$425.00	\$127.50
8/15/2019	0.1	CONTINGENCY	Email to defense counsel re: deficiency in production of billing records	MOB	Amanda Decker	\$425.00	\$42.50
8/20/2019	0.3	CONTINGENCY	Phone call with Sean Flynn re: fee petitions and prospect of settlement	MOB	Amanda Decker	\$425.00	\$127.50
8/21/2019	0.2	CONTINGENCY	Email to Sean Flynn re: outstanding insurance policy	MOB	Amanda Decker	\$425.00	\$85.00
9/4/2019	1.2	CONTINGENCY	Case law research on ICFA attorney's fees to prevailing party	MOB	Amanda Decker	\$425.00	\$510.00
9/4/2019	1.8	CONTINGENCY	Prepare Correspondence to Defense Counsel re: Opposition to Defendant's Fee Petition	MOB	Amanda Decker	\$425.00	\$765.00
9/4/2019	0.5	CONTINGENCY	Review Defendant's LR 54.3d(5) production	MOB	Amanda Decker	\$425.00	\$212.50
9/4/2019	0.2	CONTINGENCY	Phone call with Sean Flynn re: LR 54.3d(5) exchange	MOB	Amanda Decker	\$425.00	\$85.00
9/20/2019	1.2	CONTINGENCY	Research case law on Rule 54 costs when both parties prevailed on some counts	MOB	Amanda Decker	\$425.00	\$510.00
9/25/2019	0.1	CONTINGENCY	Email to defense counsel re: settlement	MOB	Amanda Decker	\$425.00	\$42.50
9/27/2019	0.2	CONTINGENCY	Phone call with Sean Flynn re: settlement and fee petition deadlines	MOB	Amanda Decker	\$425.00	\$85.00
9/30/2019	5.3	CONTINGENCY	Prepare Response to Defendant's Bill of Costs	MOB	Amanda Decker	\$425.00	\$2,252.50
10/10/2019	0.2	CONTINGENCY	Review Local Rule 54.3(e) re: joint statement	MOB	Amanda Decker	\$425.00	\$85.00
10/10/2019	2.3	CONTINGENCY	Prepare Draft of Local Rule 54.3 Joint Statement	MOB	Amanda Decker	\$425.00	\$977.50
	<b>138.8</b>						<b>\$54,420.00</b>

**Attorney Breakdown**

Attorney	Hours	Fees
Mohammed Badwan (MOB)	112	\$47,600.00
Marwan Daher (MRD)	24.8	\$6,820.00
Nathan Volheim (NCV)	NC	NC
<b>Total</b>	<b>136.8</b>	<b>\$54,420.00</b>

**Expenses**

Date	Description	Cost
5/31/2017	Filing Fee	\$400.00
6/11/2017	Service of Summons	\$49.00
2/23/2018	Ecoscribe Transcript	\$1,203.46
7/4/2018	Ecoscribe Transcript	\$1,328.00
8/29/2018	Veritext Transcript	\$751.15
		<b>\$3,731.61</b>